

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE

FILED

Rustin G. Jackson)
v.)
State of Tennessee)
County of Campbell as a body politic,)
City of Jacksboro, Darryl Mongar,)
Dustin Rose, Rick Woodward, et al)

Civil Action No. 3:04-cv-344

Judge Varlan

U.S. DISTRICT COURT
EASTERN DIST. TENN.

BY _____ DEPT. CLERK

**Rustin G. Jackson's Interrogatories of the State of Tennessee and request for
Production of Documents**

The PLAINTIFF RUSTIN G JACKSON, now appears and requests the following Interrogatories to be answered by the Defendant Phil Bredesen (State of Tennessee) fully and sufficiently, in writing and under oath, within 30 days after service as specified by FRCP 33(b)(3); Smith v. Principal Cas. Ins. Co., 131 F.R.D. 104, 104 (S.D. Miss.1990). Interrogatory submitted after meeting of parties as specified by FRCP 26(f).

Definitions for the following interrogatives and requests:

“you” “yourself” refers to Phil Bredesen, then refers to State of Tennessee.

“your” and “yourself” refers to of, belonging to, or associated with Phil Bredesen, then refers to State of Tennessee;

“entity” shall include person, individual, firm, partnership, association, corporation, parties, proprietorships, organizations, legal, business, governmental, charity or thing having real existence.

Instructions for the following interrogatives:

If any interrogatory is deemed to call for a response containing a privileged oral or written communication, or information protected from disclosure by the work product doctrine or otherwise, a list of the information withheld is to be furnished , and shall contain: (a) the identity of the speaker or author, (b) the identity of the persons to whom the communication was directed, (c) the identity of all other person who were present at the time of the oral communication or who read the written communication, (e) the date and place of the communication, (f) the subject matter of the communication, (g) a statement of fact constituting the basis for withholding the information, (i) state the request to which the information or document relates, and (j) identify the document or oral communication withheld.

The Interrogatories are continuing in nature and subsequently acquired or recalled information should be filed by the way of written supplements to your answers. Interrogatory answers should be supplemented as soon as the party learns that an answer is in some respect incomplete or incorrect and that the additional information has not been made known to the other parties during the discovery process or in writing

An evasive or incomplete answer may be treated as a failure to answer, possibly subjecting the answering party to sanctions under FRCP 37(d). The person answering the interrogatories must furnish all available requested discoverable information to the producing party.

The affidavit verifying the answers to interrogatories must be unqualified and cannot be made on information and belief.

INTERROGATORIES

1. Who are the persons answering the interrogatories, supplying information, or in anyway assisting with the preparation of answers?

ANSWER:

2. Is Phil Bredesen your correct name? State your full name, Birth Date, Social Security Number, Occupation.

ANSWER:

3. Are you and/or the State Insured and/or Bonded? (If so include any and every insurance and/ inclusive or contract agreement applicable as in accordance to FRCP 26)

ANSWER:

4. During the years 2003 and 2004:

- a) Did you receive emails, letters and/or documents from Rustin G. Jackson during 2003 and 2004?
- b) Did you respond to any letters from Rustin G. Jackson during the years 2003 and 2004?
- c) What were these letters pertaining to?
- d) Include copies of the letters and emails to and from Rustin G. Jackson, any and all office memo's decisions and documents and/or data compilations made of Rustin G. Jackson's concerns and how they were addressed.
- e) Please state name, address and telephone number of the individual, individuals or entity and a summary as to what was contained in each discussion, and approximant time of each discussion relating to anyone with knowledge or materials of these correspondences.

ANSWER:

5. During your visit to Campbell County in 2003, do you recall a man in a double breasted blue suit, being addressed by State Trooper Rick Woodward as "Okey's boy", while trying to approach you to speak of these same issues?

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Any and all "documents" as previously defined or relating to Interrogatories One (1) through Five (5).

RESPONSE:

2. Any and all "documents", data compilations, written statements, audio, video tapes, memos, response, points bulletins, complaints made or interest about Rustin G. Jackson or previous employment of Rustin G. Jackson or other tangible evidence relating to any State, Gubernatorial, Police or Judicial interaction with Plaintiff?

RESPONSE:

3. Any and all demonstrative aids the defense plans to use at trial.

RESPONSE:

4. Any all and all witnesses Defendant intends to attempt to introduce as evidence at trial.

RESPONSE:

5. Any and all documentation pertaining to any civil or criminal actions involving, yourself as the Defendant.

RESPONSE:

November 22, 2005

Plaintiff
Rustin G. Jackson
108 Chapman Lane
Jacksboro TN, 37757
423-494-7163
rustingjacks@comcast.net

I, Phil Bredesen, after being duly sworn, make oath that the forgoing answers to the **Rustin G. Jackson's Interrogatories of the State of Tennessee and request for Production of Documents are true and fully answered to the best of my knowledge, information and belief.**

PHIL BREDESEN
GOVENOR

STATE OF TENNESSEE

COUNTY OF _____

Personally appeared before me Rustin Jackson with whom I am personally acquainted and who acknowledged that he executed the with instrument for the purposes therein contained.

Witnessed my hand, at office, this _____ day of _____, 2005.

Notary Public

My Commission Expires: _____